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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA GOLD MINES LLC, a Delaware
limited liability company,

Plaintiff,

vs.

IMATECH SYSTEMS CYPRUS PTY LTD
dba ARMORPIPE™ TECHNOLOGIES, a
foreign Corporation; INTERNATIONAL
MATERIALS & TECHNOLOGY PTY
LIMITED dba IMATECH, a foreign
corporation, IMATECH MANUFACTURING
CENTRE PTY LTD a foreign Corporation;
ARMORPIPE PTY LTD., a foreign
corporation and DOES 1 to 10, inclusive,

Defendants.

Case No. 3:18-cv-00575-RCJ-WGC

**STIPULATION AND ORDER REGARDING TAKING
INTERNATIONAL DEPOSITIONS AND TO PERMIT FACT WITNESS DISCOVERY
BEYOND OCTOBER 12, 2020**

Plaintiff NEVADA GOLD MINES, LLC and Defendants IMATECH SYSTEMS
CYPRUS PTY LTD dba ARMORPIPE™ TECHNOLOGIES, INTERNATIONAL
MATERIALS & TECHNOLOGY PTY LIMITED dba IMATECH, IMATECH

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1 MANUFACTURING CENTRE PTY LTD, and ARMORPIPE PTY LTD,¹ hereby stipulate as
2 follows:

3 1) Plaintiff wishes to take and has noticed nine (9) depositions of relevant persons
4 and FRCP 30(b)(6) witnesses including Glenn MacGregor, Russell Eggers, Anthony Davis,
5 Philip Holliday, Warwick John Rule, Imatech Materials & Technology Pty Limited, ArmorPipe
6 Technologies, Imatech Systems Cyprus Pty Ltd., and Imatech Manufacturing Centre Pty Ltd.
7 These witnesses reside/are employed outside of the United States.

8 2) Defendants are also noticing depositions pertaining to persons who reside outside
9 of the United States.

10 3) The parties agree these witnesses will be produced, via Zoom conference service,
11 or other similar videoconferencing platform, for said depositions and further agree the Court
12 Reporter and Videographer will be present in the United States for said depositions.

13 4) The parties agree the Court Reporter shall swear in the witnesses on the record
14 and the witnesses' oaths shall have the same force and effect as though administered in person in
15 the United States.

16 5) The parties agree that exhibits referenced during each deposition shall be shared
17 via Zoom, or other similar videoconferencing platform, either utilizing the chat feature or the
18 share screen. At the conclusion of each deposition, Plaintiff's counsel shall email the Court
19 Reporter all exhibits used.

20 6) The witnesses, to the extent possible, should have a computer available to receive
21 potential deposition exhibits.

22 7) As this case has developed, expert witness discovery is commencing during a
23 time period set aside for fact witness discovery and fact witness discovery may be foreseeable in
24 a time period otherwise designated for expert witness discovery. The parties have met and
25 conferred and are working collaboratively together to accommodate witness schedules, attorney
26 schedules and client schedules. Scheduling is particularly difficult given the location of various
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28 ¹ All jurisdictional objections are preserved by defendants.

witnesses together with COVID-19 complications. The parties stipulated that October 12, 2020 should not serve as a bright line cut-off for fact witness discovery. At the present time, the parties do not envision other deadlines being affected by this Stipulation.

8) This Stipulation may be modified by the parties and/or Court Order. The Stipulation is entered into in good faith, not for purposes of delay, takes into account COVID-19 concerns and is intended to help streamline the discovery process.

IT IS SO STIPULATED AND AGREED.

DATED this 8th day of September, 2020.

DATED this 8th day of September, 2020.

McDONALD CARANO LLP

SANTORO WHITMIRE

By: /s/ Sarah Ferguson

By: /s/ James E. Whitmire

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IT IS SO ORDERED.

William G. Cobb
UNITED STATES MAGISTRATE JUDGE

DATED: September 9, 2020.